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9 **UNITED STATES DISTRICT COURT**
10 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

11 In re: INCRETIN-BASED THERAPIES
12 PRODUCTS LIABILITY
13 LITIGATION

14 *As to All Related and Member Cases*
15
16

Case No. 13-md-2452-AJB-MDD

**JOINT MOTION FOR
APPROVAL OF PROPOSED
CASE MANAGEMENT ORDER**

Judge: Hon. Anthony J. Battaglia
Magistrate: Hon. Mitchell D. Dembin

1 The parties have met and conferred and jointly move for this Court's approval
2 of its Proposed Case Management Order ("Order") concerning limitations on written
3 discovery, lodged simultaneously herewith. The Order results from a negotiated
4 agreement between the parties, and is intended to streamline written discovery in an
5 effort to promote a "just, speedy, and inexpensive determination" of this action, as
6 required by the Federal Rules of Civil Procedure.

7 Accordingly, the parties request this Court's approval of its Order.

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9 Respectfully submitted,

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11 Dated: February 18, 2014

12 DLA PIPER LLP (US)

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14 By: /s/ Christopher M. Young
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